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**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA)	Crim. No. 1:18-CR-457 (AJT)
)	
v.)	<u>IN CAMERA, EX PARTE</u>
)	AND UNDER SEAL
BIJAN RAFIEKIAN and)	
KAMIL EKIM ALPTEKIN,)	
)	
Defendants)	

**GOVERNMENT'S CLASSIFIED EX PARTE, IN CAMERA MEMORANDUM OF LAW
AND MOTION FOR A PROTECTIVE ORDER PURSUANT TO SECTION 4 OF THE
CLASSIFIED INFORMATION PROCEDURES ACT AND RULE 16(d)(1) OF THE
FEDERAL RULES OF CRIMINAL PROCEDURE**